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March 7, 2014

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90, Expression of Interest

Ms. Dortch;

ITS Telecommunications Systems, Inc., DBA, ITS Telecom hereby provides this “Expression of Interest” in conjunction with the Commission's order¹ initiating rural broadband experiments to provide robust, scalable high-speed broadband to unserved high-cost areas with additional Connect America funding.

Background

ITS Telecom (ITS) is an Incumbent Local Exchange Carrier (ILEC) that has been providing rural telephony since the 1930s. In 2002 ITS introduced High Speed Internet service to its customers and in 2010 began the deployment of a fiber to the premise network within the city limits. The company has 27 employees and provides voice and data services to its customers located in the Indiantown, Florida telephone exchange. ITS Telecom is an eligible telecommunications carrier (ETC) in its rate of return service area.

Description of the Project

Broadband service has become the most sought after technology by ITS's rural customers. Customers in the rural areas surrounding ITS's service territory do not have access to high speed broadband service. Eligible high cost unserved customers represent 4.2 customers per square mile in the proposed census tracts. ITS seeks to expand its network and intends to deploy FTTH technology to the unserved eligible locations within the geographic area indicated below.

Proposed Technology

ITS will initially deploy a FTTH network using fiber electronics capable of providing broadband in a range of service options up to one (1) Gigabit Ethernet (GE) service. Greater broadband speeds are achievable with current technology and will be deployed to meet demand on an as

¹ See Technology Transitions et al., GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014).

needed basis. A network interface device will be installed at each customer location and will be equipped with battery backup capability in case of electrical power outages.

ITS's proposed solution will be deployed over a FTTx system designed to deliver 2.1 Gbps through either a GPON solution or an Active Gigabit Ethernet (GE) solution using the same platform. This system allows the flexibility to meet current and future bandwidth requirements of video, data and voice and easily move to full gigabit ethernet solution if required.

In addition to a deployable FTTx solution, ITS's system will also be scalable to a ten (10) gigabit capacity by simply changing out optical electronics within the deployed system. This allows ITS to increase bandwidth capacity to residential customers, businesses, or anchor institutions to meet future bandwidth demands. In addition, the proposed fiber is capable of providing 100 gigabit connections over 40 wavelengths with today's technology. Once fiber is deployed, the only limitations are the developed electronics available in the market place.

Anchor Institutions

Based on the proposed service area, there are four anchor institutions that would benefit from expanded high speed broadband service. Anchor institutions within the proposed service territory include; Martin Correctional Institution, GEO Hospital, Florida Light and Power Plant, and Co Gen a coal fired power plant.

Partnerships

ITS will utilize its existing middle mile infrastructure to minimize construction cost. The company also has connections to ATT, Level3, and FPLFibernet regional networks which provide connectivity to internet backbone providers.

Geography and Eligible Locations

The company proposes to provide voice, video, and data services through a state of the art fiber network in the following census tracts:

State	County Name	Census Tract	Eligible Locations
FL	Martin	12085001801	1607
FL	Martin	12085001802	629
FL	Martin	12085001700	150
	Total		2,386

Proposed Services and Pricing

The company will offer Data, Voice, and Video services to customers within the proposed rural census tracts. ITS will offer broadband service at a minimum speed of 15 Mbps Downstream / 1 Mbps Upstream for \$54.95 per month with various service tiers up to 100 Mbps downstream / 1 Mbps upstream for \$84.95 per month. Additional tiers will be added as demand for those services becomes evident.

Project Cost / Funding

The estimated construction cost is a high level estimate based on historical data. The total estimated construction cost for the project is \$4,250,000. ITS requests rural broadband experiment one-time funding of \$4,250,000.

ITS Telecom appreciates the opportunity to provide this expression of interest for funding of rural broadband experiments. Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Don Pittman", with a stylized, flowing script.

Don Pittman
Vice President / CFO